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5 Attorney for Defendant Anthony C. Guerrero
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7 **UNITED STATES DISTRICT COURT**
8 **FOR THE NORTHERN MARIANA ISLANDS**
9

10 **UNITED STATES OF AMERICA,**

11 **Plaintiff,**

12 **vs.**

13 **TIMOTHY P. VILLAGOMEZ,**
14 **ANTHONY C. GUERRERO,**
15 **JOAQUINA V. SANTOS, and**
16 **JAMES A. SANTOS**

17 **Defendants.**
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Criminal Case No. 08-00020

**STIPULATED REQUEST AS
TO DEFENDANT
ANTHONY C. GUERRERO
TO RETURN PASSPORT
AND TO ALLOW TRAVEL
OUT OF THE CNMI; and**

**STIPULATED REQUEST
TO CONTINUE
SENTENCING HEARING
AND RESET DATE FOR
DEADLINE OF
PRESENTENCE
INVESTIGATION REPORT**

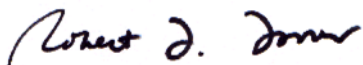
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23 Defendant **ANTHONY C. GUERRERO**, by and through Counsel

1 Robert T. Torres, and Plaintiff the United State s of America, through Assistant
2 United States Attorney Eric S. O'Malley, hereby stipulate to and respectfully
3 move this Court as follows:

4 A. To allow the return of Mr. Guerrero's passport and to allow him to
5 travel out of the CNMI for a short period to visit to family, departing the
6 CNMI on September 22nd for at least two weeks, and then leave and then
7 return to the CNMI on October 6th. Mr. Guerrero will visit immediate family
8 in Portland, Oregon; Boise, Idaho, and Washington state. Mr. Guerrero will
9 have a physical address for the places he will stay as well as a cellular phone
10 where he may be reached at all times. Mr. Guerrero has conferred with U.S.
11 Probation Officer Melinda Brunson regarding his intended departure request.
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13 B. To continue his sentencing hearing and to reset the deadline for the
14 Presentence Investigation Report. Mr. Guerrero and the United States
15 request to reschedule his sentencing hearing to late February, 2009 and set a
16 deadline for the Presentence Investigation Report in early January. The jury
17 trial for the other co-defendants will be continued to a date in January and
18 Mr. Guerrero and the United States maintain that sentencing after the jury
19 trial date for Mr. Guerrero would be appropriate as well as in the interests of
20 justice.
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1 SO STIPULATED and respectfully submitted this 11th day of September,
2 2008.

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5 Robert Tenorio Torres, F0197
6 Attorney for Defendant Anthony C. Guerrero

7 /s/ Eric S. O'Malley
8 Eric S. O'Malley
9 Assistant United States Attorney
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